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*Attorney for Plaintiff and Counter-Defendant  
Moog Inc.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC. ROBERT ALIN  
PILKINGTON, MISOOK KIM, and  
DOES NOS. 1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

**PLAINTIFF MOOG INC.'S  
APPLICATION FOR LEAVE TO  
FILE UNDER SEAL DESIGNATED  
MATERIALS FROM ITS  
SUPPLEMENTAL FILING RE:  
JOINT STIPULATION RE:  
DEFENDANTS' MOTION TO  
OVERRULE MOOG'S OBJECTION  
TO SKYRYSE'S DISCLOSURE OF  
CONFIDENTIAL INFORMATION  
TO VINCENT SOCCI**

1 SKYRYSE, INC.,  
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3 Counterclaimant,  
4 vs.  
5 MOOG INC.,  
6 Counter-Defendant.  
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Judge: Hon. George H. Wu  
Magistrate Judge: Hon. Margo A. Rocconi

1           **TO THE ABOVE CAPTIONED COURT, AND TO ALL PARTIES**  
2           **AND THEIR ATTORNEYS OF RECORD:**

3           Pursuant to Local Rule 79-5 *et seq.*, Plaintiff and Counter-Defendant Moog  
4 Inc. (“Moog”) hereby submits this application for an order permitting it to file under  
5 seal portions of its Supplemental Filing Re: Joint Stipulation Re: Defendants’  
6 Motion to Overrule Moog’s Objection to Skyrise’s Disclosure of Confidential  
7 Information to Vincent Socci (the “Designated Materials”).

8           Moog submits that compelling reasons exist to permit the Designated  
9 Materials to be filed under seal. The Designated Materials include documents and  
10 excerpts of documents that Moog hereby identifies as Protected Material pursuant to  
11 the Protective Order entered in this action on May 6, 2022 (the “Protective Order”)  
12 (Dkt. 89). Specifically, the Designated Materials contain various internal  
13 representative contracts and agreements that Moog requires its engineering  
14 employees and contractors to sign when working for Moog, and Moog hereby  
15 designates such contracts and agreements as “HIGHLY CONFIDENTIAL—  
16 ATTORNEYS’ EYES ONLY” under the Protective Order. The material that Moog  
17 requests to file under seal is the type of information that Moog does not make  
18 public, does not share with competitors, and keeps confidential in its business. If  
19 disclosed publicly, it could be used by Moog’s competitors to secure unfair  
20 competitive advantage and cause irreparable business harm. The contracts and  
21 agreements themselves also contain certain confidentiality provisions.

22           Specifically, Moog seeks to file the following Designated Materials under  
23 seal: 1) highlighted portions of the Supplemental Filing; and 2) Exhibits A, B, C,  
24 and D to the Supplemental Filing.

25           This application is further based upon the accompanying Declaration of  
26 Kazim Naqvi in Support of this Application; any pleadings, files, and records in this  
27 action; and any further evidence or argument as this Court may consider.

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1 Dated: June 28, 2023

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3  
4 By /s/ Kazim Naqvi  
Kazim Naqvi

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6 Attorney for Plaintiff and Counter-Defendant  
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